



CALIFORNIA FARM BUREAU FEDERATION

NATIONAL AFFAIRS & RESEARCH DIVISION

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USDA/FSIS Hearing Clerk
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Washington, DC 20250-3700

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Docket No. 98-045N

Dear Sir/Madam:

The California Farm Bureau Federation (CFBF) is the largest general farm organization in California with more than 75,000 member families. We appreciate the opportunity to comment on the US Department of Agriculture's (USDA) *Food Safety Initiative Strategic Plan*.

Based on the size and scope of our agricultural industry, California has a genuine interest in the development of food safety plans. In 1997, California's farmers produced more than \$27 billion in farm gate receipts while providing for one out of every 10 jobs and contributing more than \$70 billion annually in total economic output. Furthermore, California now produces more than 350 crops, supplying 50 percent of the American consumer's fresh fruits and vegetables.

Of utmost concern to CFBF is reassurance of consumers that the produce grown in the United States is of the highest quality and safe for consumption. The USDA has put much emphasis into its Five-A-Day Program which seeks to increase the consumption of fruits and vegetables. This program's objective can be better achieved with additional support from intra-agency activities such as the *Food Safety Initiative Strategic Plan*. CFBF supports the Five-A-Day Program and supports the continued efforts of USDA to bolster consumer confidence in food quality and safety.

1. Does the vision statement accurately depict an achievable food safety system vision?

No. While we understand that a vision statement is designed to provide a broad view of what is to be accomplished, we recommend the following changes to the proposed statement:

Consumers can continue to be confident that food **produced in the United States** is safe, **healthy healthful**, and **the most** affordable **in the world**. We work within a seamless food safety system that uses farm-to-table preventive strategies and integrated research, surveillance, inspection, and enforcement. We are vigilant to new and emergent threats and consider the needs of **vulnerable all** populations. We use **public/private partnerships to incorporate** science- and risk-based approaches **along with public/private partnerships** Food is safe **because when** everyone understands and accepts **fulfills** their responsibilities.

“Consumers can continue to be confident that food produced in the United States is safe, healthful, and the most affordable in the world. ”

At this time, it is important to inform the consumer that our food safety system is designed to regulate only **fruits** and vegetables domestically produced. As of yet, Congress has not passed legislation giving US Food and Drug Administration (FDA) authority to regulate the production of fruits and vegetables in importing countries. “What is clear is that federal officials cannot use the same methods in regulating imported food that they use -- or that would make sense -- in regulating domestically produced food.”¹ CFBF believes this as an important component of a comprehensive food safety system and as an organization supports the requirement that imported food products be subjected to the same high safety standards and testing as food produced in the US. However, until such statutory changes are made by Congress, it is essential that the food safety vision be specific and clear regarding the scope of food products it will impact. (Aside: healthy people result from eating **healthful** foods.)

“We are vigilant to new and emergent threats and consider the needs of all populations.”

A food safety system developed by the government should aim to protect all populations. The National Research Council states, “A food safety risk is the probability of harm to health resulting from a food-related hazard at a particular exposure to a specified person or group.”² Even though this statement could be interpreted to support the use of the word ‘vulnerable,’ because at any one time any individual would be vulnerable to a food-borne illness, the word is alarming and not supportive of the overall scope of the vision which is to protect all consumers. Therefore, we recommend substituting the word ‘all’ in place of the word ‘vulnerable’ in an effort to keep the positive outlook of the statement intact and to ensure that no individuals are left out of the proposed system.

“We use public/private partnerships to incorporate science- and risk-based approaches. ”

The emphasis of the vision statement should be the importance of public/private partnerships to accomplish the stated goal of a safe food system. To say that “science- and risk-based approaches are used along with public/private partnerships” connotes a different message. We in the agricultural industry are willing to work with the government to develop methods that assure safe food for the American consumer. However, agriculture must be considered an equal partner and not only as a regulated community. We believe the rewrite of this sentence correctly states the intention of the vision statement.

“Food is safe when everyone understands and fulfills their responsibilities. ”

There would be no purpose for this vision statement if food was determined safe because people

¹National Research Council, *Ensuring Safe Food From Production to Consumption*, National Academy Press, Washington D. C., 1998, p. 89.

*p. 21.

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understand and accept responsibility. The issue with this sentence is the word 'because' does not provide any obtainable measure to achieve and the word 'accepts' only signifies the beginning of the process. If an individual accepts responsibility but does nothing with that responsibility, our food safety system is no better than when it was developed. Another reason to support the change to 'fulfills' is that agriculture has accepted responsibility for food safety through the development and implementation of Hazard Analysis and Critical Control Point (HACCP) plans, Good Manufacturing Practices (GMPs), and Quality Assurance Plans (QAPs). However, we have yet to fulfill our responsibility completely. This is an issue agriculture respects genuinely and one for which we continue to seek success.

The major concern of the federal government must be with the consumer. "Great responsibility lies with consumers who must be cognizant of the level of safety associated with the foods they purchase and who must handle these foods accordingly."³ CFBF supports USDA-sponsored programs such as Fight Bac and Five-A-Day. We continue to work for ongoing funding of existing programs and finding for the development of beneficial, new programs.

2. What are the barriers to pursuing this vision? What gaps currently exist in the food safety system that impede achievement of this vision?

Two significant barriers exist which inhibit the success of the vision: 1) the current food safety system; and, 2) the evolution of a large population of consumers unfamiliar with agricultural production or the steps necessary to ensure a safer product.

The current food safety system, with its inconsistent rules, duplicative policies, and unmanaged resources, is the most significant gap to be addressed. CFBF agrees with the recommendations and conclusions of the National Research Council regarding the current food safety system. We also support the development of a single food safety authority responsible for safety and inspection. We recommend that this authority be under the direction of the Secretary of Agriculture and that USDA serve as the sole agency responsible for food safety.

Education is another significant barrier which must be overcome prior to achieving the proposed vision. According to a Centers for Disease Control and Prevention study, improper cooking and holding temperatures were blamed for 55 percent of the 1,435 outbreaks of food-borne illness from 1988 to 1992; poor hygiene accounted for 24 percent of the total outbreaks. Unsafe food sources were blamed for just three percent of the problems.⁴ Partnerships between the government and retailers must be forged to provide a direct channel of communication about food handling practices to the consumer. A successful and meaningful food safety program will be realized when the percentage of outbreaks associated with preparation and hygiene decreases.

⁴Cook, Bill, Conference Focuses on Food Safety, *San Joaquin Record*, March 23, 1998.

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As part of state licensing procedures, CFBF encourages the education of all food handlers on sanitary practices and on the proper preparation and cooking of all food products.

3. To make the vision a reality, what changes are needed for: a) government agencies at the Federal, State, and local level; b) industry; c) public health professionals; d) consumers; and e) others?

a) Government agencies at the federal, state, and local level must be seen as partners and not adversaries in this pursuit. To accomplish this, we recommend that government personnel take time to visit agricultural operations not as regulators but as students. This activity would accomplish two goals: 1) individuals responsible for drafting and implementing regulations would have a better understanding of the effects of their work, and, 2) members of the agricultural community would learn to accept the government as a partner with a common goal.

Moreover, relations among agencies must be developed so that a single vision can be accomplished. Much too often, individuals in industry find themselves in battles between agencies. These incidents must be eliminated if a food safety system is expected to succeed.

b) The agricultural industry must continue to adopt the most advanced technology and cultural practices that ensure a safe product. Furthermore, organizations such as Farm Bureau must continue to serve as the liaison between agencies and farmers. Enhanced communication to the farm will result in greater involvement in grassroots meetings and consensus building activities.

c) Public health professionals play a crucial role in educating the public about identification of food-borne illness. Much of the data used today are at best educated guesses estimating the number of unreported cases of food-borne illness. Accurate reporting of actual numbers is essential for a successful food safety program.

d) Consumers are the most important party of a food safety program because they will determine the program's overall success. Consumers must be made aware of potential harm and educated about the steps necessary to prevent that harm.

e) Media is an important part of any food safety system. Far too often, media focuses on the disasters and results of an outbreak rather than assuming some of the responsibility of educating the public.

4. What should be the short-term goals and critical steps to realize this vision? What should be the long-term goals and steps?

Short-term goals include passing legislation requiring imported food products to be subjected to the same high quality standards and testing as food domestically produced, increasing food safety research budgets, and incorporating science into existing inspection practices.

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Long-term goals include the establishment of a single food safety authority. This individual and staff should answer to the Secretary of Agriculture and have full responsibility of all food inspection and safety activities.

Education is both a short-term and long-term goal. Existing programs must continue to receive funding and support from Congress and the Administration. In addition, new programs must be developed that reach a large scope of consumers, retailers, and food handlers. These programs should be a cooperative effort among industry, consumers and government. This effort should not only focus on the dissemination of accurate information but also on mechanisms which change behavior.

5. What is the best way to involve the public in development of a long-term food safety strategic plan? What additional steps besides public meetings would be beneficial?

One of the most effective and efficient methods for federal agencies to use to communicate with the public is through organizations such as Farm Bureau. If notified with adequate time, the California Farm Bureau Federation would be more than pleased to disseminate information to our members and encourage participation in public meetings. The *Federal Register* is not an effective mechanism to communicate with farmers.

We encourage the development of regional communication teams composed of industry, government, and consumer representatives that would be responsible for disseminating information about meetings, hearings, and comment periods. Forging these partnerships emphasizes a desire to not only accomplish the vision but to allow interested parties to be an integral part of the food safety system.

An additional step to involve the public is to utilize the public school system. Programs could be developed that are educational as well as informative for school children of all ages. More likely than not, printed information and classroom projects will find its way to the children's home resulting in greater awareness by the entire family unit. These educational units should be developed with the assistance of the regional communication teams mentioned above to ensure that all interested parties have buy-in to the printed material.

One final step to consider is the development of an educational trade show booth. This booth would travel to fairs, education seminars, trade shows, and shopping centers to provide information to the general public.

6. What are your comments on the conclusions and recommendations of the National Academy of Sciences' report, "Ensuring Safe Food From Production to Consumption"?

In general, the California Farm Bureau Federation agrees with the conclusions and recommendations of the National Academy of Sciences' report. Farm Bureau policy strictly

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adheres to the principles of a science-based food safety policy, harmonization of federal, state, and local rules and regulations, and increased education for all involved in food production and consumption.

In particular, Farm Bureau supports measures to improve and streamline food inspection by having USDA serve as the sole federal agency responsible for food inspection and safety. We agree with the committee's recommendation that one official should be responsible for federal efforts in food safety and have control of the resources allocated to food safety. We recommend that this individual report to the Secretary of Agriculture and ultimately the President of the United States.

The creation of a single food safety agency, independent of the USDA, is a recommendation that the Farm Bureau does not support.

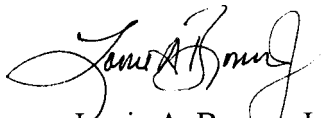
Farm Bureau policy specifically references the need for cooperative efforts among growers, food processors, chemical companies, government agencies, and scientists to provide factual information on food safety. The information developed must be used to address the following two major problems with respect to consumer education: consumer knowledge is inadequate or erroneous, and even where knowledge is adequate, it often fails to influence behaviors

CONCLUSION:

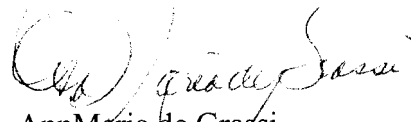
The California Farm Bureau Federation understands that ensuring the safety of food is a top priority and is willing to cooperate in the development of a system based on science, communication, and education. We also realize that the effort to restructure the current system is an endeavor which will take time and commitment from all parties.

The American consumer must be assured that the food produced, prepared, and served in the United States is of the utmost quality and in accordance with the highest safety standards in the world. This can only be achieved when all parties accept and fulfill their responsibility. Agriculture continues to incorporate the latest technological advancements that minimize microbial contamination while maximizing quality and profit. This is the responsibility we have accepted and will continue to fulfill.

Respectfully,



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